

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

AKOLOUTHEO, LLC,	§	
	§	
Plaintiff,	§	CIVIL ACTION NO. 6:19-cv-705
	§	
v.	§	JURY TRIAL DEMANDED
	§	
ELSTER SOLUTIONS, LLC, ET AL,	§	
	§	
Defendants.	§	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendants Elster Solutions, LLC and Elster American Meter Company, LLC (collectively referred to as “Elster Defendants”) file this Unopposed Motion for Extension of Time to Respond to Complaint and respectfully show the following:

Plaintiff Akoloutheo, LLC (“Akoloutheo”) filed its Complaint on December 12, 2019 (Dkt. No. 1). The Elster Defendants were served a copy of the summons on December 16, 2019. Elster Defendants’ answers are currently due on January, 6, 2020.

Elster Defendants request an extension to respond on or before February 5, 2020. Counsel for the Elster Defendants conferred with counsel for Akoloutheo who stated that Akoloutheo does not oppose this request.

Wherefore, the Elster Defendants respectfully request that the Court grant this motion and enter an order extending the deadline for Elster Solutions, LLC and Elster American Meter Company, LLC to answer or otherwise respond to the Complaint to February 5, 2020.

Respectfully submitted,

/s/ J. Thad Heartfield
J. Thad Heartfield
Texas Bar No. 09346800
THE HEARTFIELD LAW FIRM

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ATTORNEYS FOR DEFENDANTS,
ELSTER SOLUTIONS, LLC and
ELSTER AMERICAN METER
COMPANY, LLC

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7-(i), the undersigned hereby certifies that on December 17, 2019 he conferred by email with counsel for Plaintiff, who stated that Plaintiff is unopposed to the relief requested herein.

/s/ J. Thad Heartfield
J. Thad Heartfield

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on December 20, 2019.

/s/ J. Thad Heartfield
J. Thad Heartfield